

INVENTORY REPORTING

1. Public Law 105-270 (The Federal Activities Inventory Reform Act of 1998) requires agencies to annually submit to OMB a list of activities that the head of the executive agency determines are not inherently governmental functions. The act also requires the agency to notify the public of the availability of the list.
2. The head of the executive agency for USACE reporting purposes is the SecDef. Therefore, we report the civil works inventory through Army and Army reports to defense and defense reports to the Office of Management and Budget (OMB).
3. Policy and guidance for submitting the report is in OMB Circular No. A-76.
4. The Office of the Secretary of Defense (OSD) also publishes guidance for preparing the Inventory of Commercial and Inherently Governmental Activities (ICIGA). The ICIGA is a list of all authorizations with commercial activities function codes (CAFCs) and commercial activities reason codes (CARCs) assigned according to the instructions and subordinate component clarifying instructions. The list includes ALL positions: inherently governmental, commercial reviewable, and commercial exempt.
5. The SecArmy has assigned responsibility for policy, guidance, and reporting to the Assistant Secretary of the Army for Manpower and Reserve Affairs (ASA(M&RA)). An activity/function is considered reviewable unless the ASA(M&RA) issues a determination that it is inherently governmental/exempted. The ASA(M&RA) permits USACE to assign CAFCs and CARCs to the civil works inventory, subject to their review and approval. The military programs funded report is coded entirely at the Army level. We are afforded an opportunity to review and discuss their re-coding of the CW inventory and their coding of the Army inventory.
6. An exemption determination means either the activity/function has been exempted from Secretary White's Non-Core Competencies (NCC) initiative, or, in the case of the ICIGA, is exempt from competition under the rules of OMB Circular No. A-76 but still subject to some form of competition under other Federal Acquisition Regulation (FAR) provisions.
7. OSD has established a Website that lists all Department of Defense commercial and exempt activities. Functions/activities coded "A" on the list are functions that are exempt from the cost comparison requirements of the Circular (but are subject to competition under other FAR provisions). Functions/activities coded "B" on the list are subject to the cost comparison requirements of the Circular.
8. The competitive sourcing initiative in the President's Management Agenda and the SecArmy's NCC take the process a step further and requires agencies/organizations to compete a certain amount of positions over the next few years.

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